

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Adriane Leche, *
Plaintiff *
*
v. *
*
The Community College System of *
New Hampshire *
d/b/a Manchester Community College, *
Defendant *

COMPLAINT
(Jury Trial Requested)

NOW COMES the plaintiff, Adriane Leche, by and through her attorneys Douglas, Leonard & Garvey, P.C., and respectfully submits the within Complaint, stating as follows:

I. Parties

1. The plaintiff Adriane Leche resides at 5312 Beechwood Point Court, Midlothian, Virginia. Ms. Leche is African-American and a person of color.

2. The defendant, The Community College System of New Hampshire (CCSNH) is a State-chartered corporation with a principal place of business located at 26 College Drive, Concord, New Hampshire. CCSNH operates Manchester Community College (the College), at 1066 Front Street, Manchester, New Hampshire.

II. Jurisdiction and Venue

3. The Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331. The Court may exercise supplemental jurisdiction over the plaintiff's State law claims. The Court has personal jurisdiction over the defendant because it is a resident of New Hampshire.

4. Venue is proper because the acts and omissions giving rise to this action occurred within this judicial district.

III. Facts

5. Dr. Leche began employment at the College in or around January of 2021 as the College's Vice President of Academic Affairs. Dr. Leche identifies as female and African American. When Dr. Leche assumed the Vice President position, she became the only person of color in the College's administration.

6. On or about June 30, 2021, Dr. Leche received a performance review stating that she "consistently exceed(ed) expectations." "She has reinvigorated efforts associated with assessment of academic outcomes, something the college very much needed," her supervisor wrote. "Additionally, she provided helpful advice and direction for department chairs and faculty when they were faced with challenging situations," the supervisor added.

7. Dr. Leche again received a rating of "consistently exceeding expectations" in her June 29, 2022, performance review. Dr. Leche's supervisor noted that she was "a role model for campus members in many ways."

8. Dr. Leche filed a complaint with the College alleging race and sex discrimination in or around December of 2022. The defendant purportedly began an investigation of Dr. Leche's allegations. Dr. Leche alleged that the President, and Department Chairs Jason Strong, Dan Larochelle and Eddie Curran were among the perpetrators of the discrimination.

9. In or around May of 2023, Dr. Leche requested FMLA leave to care for the serious health condition of her daughter. The investigation of Dr. Leche's allegations of race and sex discrimination had not concluded when she requested FMLA leave.

10. Dr. Leche's FMLA leave was approved. She took leave July 5, 2023, through August 4, 2023. Before Dr. Leche left to care for her daughter, the Chancellor handed her the report of the investigation, finding Dr. Leche's allegations of race and sex discrimination unfounded.

11. Dr. Leche submitted a June 27, 2023, memorandum to the defendant expressing concerns regarding the investigation.

12. The Chancellor requested that Dr. Leche meet with him and the President during her FMLA leave, ostensibly to discuss making the forthcoming academic year a successful one. Dr. Leche asked that the meeting occur after she returned from FMLA leave.

13. On or about August 8, 2023, the Chancellor told Dr. Leche that "we have a problem" because the Union representative for the faculty sought a copy of the investigation report regarding Dr. Leche's allegations of race and sex discrimination.

14. On or about August 18, 2023, Dr. Leche was summoned to a meeting with the Chancellor and the President at which Dr. Leche learned that the faculty had taken a vote of no confidence in her. Department Chairs Larochelle and Strong—two (2) of the faculty members against whom Dr. Leche had alleged race and sex discrimination—organized the vote of no confidence against her. The President told Dr. Leche that he believed the time had come for them to "separate" and that Dr. Leche was no longer to report to work. The following week, Human Resources personnel advised Dr. Leche that the defendant had placed her on administrative leave.

15. The defendant ultimately terminated Dr. Leche's employment effective August 29, 2023.

16. Dr. Leche filed a Charge of Discrimination with the New Hampshire Commission for Human Rights on or about October 23, 2023. Exhibit A. The Charge was dually filed with the United States Equal Employment Opportunity Commission.

17. Dr. Leche notified the New Hampshire Commission for Human Rights of her intent to pursue a civil action by letter dated December 12, 2024. The Human Rights Commission subsequently closed its case.

18. Dr. Leche requested a Notice of Right to Sue from the United States Equal Employment Opportunity Commission and received such Notice on February 21, 2025. Exhibit B. This lawsuit is filed within 90 days of Dr. Leche's receipt of the Notice of Right to Sue, as required.

COUNT I

(Violation of Title VII and RSA 354-A—Race Discrimination)

19. The allegations of the preceding paragraphs are realleged and incorporated herein by reference.

20. Dr. Leche is an African-American female and therefore a member of a protected class.

21. Dr. Leche was qualified for her position as the Vice President of Academic Affairs, as reflected by her 2021 and 2022 performance reviews stating that she consistently exceeded expectations.

22. The defendant subjected Ms. Broadus to adverse employment actions causally related to her protected status as African-American and female, including hindrance of her ability to perform her job duties, divestment of certain job responsibilities that she held as the Vice

President of Academic Affairs, unwarranted criticism and/or denigration of her job performance, forced leave from her employment, and ultimately termination of her employment.

23. As a direct and proximate result of the defendant's race and sex discrimination, the plaintiff has suffered and continues to suffer damages, including but not limited to lost wages, lost earning capacity, lost employment benefits, emotional distress, humiliation, inconvenience and loss of enjoyment of life.

24. The plaintiff is entitled to punitive damages based on the defendant's malice and acts taken in reckless disregard of the plaintiff's federally protected rights.

25. The plaintiff is entitled to enhanced compensatory damages pursuant to RSA 354-A:21-a due to the defendant's willful or reckless disregard of her rights protected by RSA 354-A.

26. The plaintiff is entitled to her reasonable attorney's fees, plus interest and costs.

COUNT II

(Violation of Title VII and RSA 354-A—Retaliation)

27. The allegations of the preceding paragraphs are realleged and incorporated herein by reference.

28. The plaintiff engaged in protected activity, reporting to the College her reasonable belief that the defendant was subjecting her to race and sex discrimination.

29. As a direct and proximate result of the defendant's retaliation, the plaintiff has suffered and continues to suffer damages, including but not limited to lost wages, lost earning capacity, lost employment benefits, emotional distress, humiliation, inconvenience and loss of enjoyment of life.

30. The plaintiff is entitled to punitive damages based on the defendant's malice and acts taken in reckless disregard of the plaintiff's federally protected rights.

31. The plaintiff is entitled to enhanced compensatory damages pursuant to RSA 354-A:21-a due to the defendant's willful or reckless disregard of her rights protected by RSA 354-A.

32. The plaintiff is entitled to her reasonable attorney's fees, plus interest and costs.

WHEREFORE, the plaintiff Adriane Leche respectfully prays this Honorable Court:

- A. Schedule this matter for trial by jury, and after trial;
- B. Find the defendant liable for race discrimination in violation of Title VII and RSA 354-A;
- C. Find the defendant liable for retaliation in violation of Title VII and RSA 354-A;
- D. Award the plaintiff damages for lost wages, lost earning capacity, and lost employment benefits;
- E. Award the plaintiff compensatory damages for emotional distress, humiliation, inconvenience and loss of enjoyment of life;
- F. Award the plaintiff punitive damages;
- G. Award the plaintiff enhanced compensatory damages;
- H. Award the plaintiff her reasonable attorney's fees;
- I. Award the plaintiff interest and costs; and
- J. Grant such other and further relief as is just and equitable.

Respectfully submitted,
ADRIANE LECHE
By her attorneys,
DOUGLAS, LEONARD & GARVEY, P.C.

Date: May 22, 2025

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